



Solae, LLC  
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August 15, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
1400 Independence Ave., SW. Room 4008  
So., Ag Stop 0268  
Washington, DC 20250

Email: [National.List@usda.gov](mailto:National.List@usda.gov)

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Solae Company, LLC. supports the continued allowance of lecithin-unbleached and lecithin-bleached.

The Solae Company, LLC. is a global lecithin market leader providing refined lecithin products to the organic food industry which have been developed for use in a wide range of food products as processing aids, release aids, emulsifiers, and wetting agents. In the majority of food product formulations, very low levels of lecithin are used as minor ingredients to contribute beneficial functional effects. A wide array of specialty, refined lecithins have been developed to achieve the functionality required. Furthermore, there is a limited supply of organic lecithin product available that can meet functional specialty requirements to serve the demand. We believe that the continued allowance of lecithin-unbleached and lecithin-bleached within the NOP regulations is warranted in order to provide consumers with consistent high quality organic foods products.

Name of Substance	Location on National List	Market Applications
Lecithin-unbleached	205.606	Used in many applications as emulsifier, process aid, release agent, shelf life extender.
Lecithin-bleached	205.605(b)	Used in many applications as emulsifier, process aid, release agent, shelf life extender, wetting agent, dispersant.

Thank you for your consideration of our requests.

Sincerely,

Gene Faron  
Quality Assurance Director  
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August 12, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
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So., Ag Stop 0268  
Washington, DC 20250

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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07.

The Solae Company, LLC. supports the continued allowance of the following substance(s):

Name of Substance	Location on National List	Market Application
Acid - Citric Acid	205.605(a)	Used in Beverages
Acid - Lactic Acid	205.605(a)	Used in Beverages, meats
Agar	205.605(a)	Used in Cultured Foods
Calcium carbonate	205.605(a)	Used in Dry Blended Beverages
Calcium chloride	205.605(a)	Used in tofu and meats
Calcium sulfate	205.605(a)	Used in tofu
Carageenan	205.605(a)	Used in beverages for stabilization
Colors, non-synthetic	205.605(a)	Many applications for color improvement.
Dairy cultures	205.605(a)	Used in fermented products
Enzymes - animal, bacterial, fungal, plant derived	205.605(a)	Used to improve Soy Protein functionality
Flavors, non-synthetic	205.605(a)	Used to improve Soy Protein flavors
Glucono delta-lactone	205.605(a)	Used in Tofu
Magnesium sulfate	205.605(a)	Used in Tofu
Potassium chloride	205.605(a)	Used in various applications for salt (Na) replacement

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Sodium bicarbonate	205.605(a)	Use as Soy Protein process aid and in soy milk processi
Yeast(non-synthetic)	205.605(a)	Used in Fermented products - micronutrient fortification
Potassium iodide*	205.605(a), 205.605(b)	Used in nutrient fortification with Iodine .
Cornstarch (native)	205.606	Used in many applications such as puddings and sauces
Gums (water extracted- arabic, guar, locust bean, carob bean)	205.606	Used in beverages for viscosity control and stabilization
Lecithin (unbleached)	205.606	Used in many applications as emulsifier, process aid, release agent, shelf life extender.
Pectin (high-methoxy)	205.606	Used in acidic beverage wet applications
Alginates	205.605(b)	Used in a wide range of food applications
Ammonium bicarbonate	205.605(b)	Used in baking applications
Ammonium carbonate	205.605(b)	Used in baking applications
Ascorbic acid	205.605(b)	Used in oxidation stabilization, such as in spray on oils or lecithin
Calcium citrate	205.605(b)	Used in Calcium fortified applications.
Calcium hydroxide	205.605(b)	Used in extraction process of Isolated Soy Protein
Calcium phosphates (mono, di, tribasic)	205.605(b)	Used in Calcium fortified soy protein products
Carbon dioxide	205.605(b)	Used in super critical extraction processing of foods
Cellulose	205.605(b)	Used in various food applications
Chlorine Materials: chlorine dioxide, calcium & sodium hypochlorite	205.605(b)	Used as sanitizing agents in food processing
Ferrous sulfate	205.605(b)	Used for fortification of iron
Glycerides (mono & di)	205.605(b)	Used in beverage powders to enhance fat emulsification
Glycerin	205.605(b)	Used in nutritional bars
Hydrogen peroxide	205.605(b)	Used as a process aid for microbiological control.
Lecithin-bleached	205.605(b)	Used in many applications as emulsifier, process aid, release agent, shelf life extender, wetting agent, dispers
Magnesium carbonate*	205.605(b)	Used in mineral fortification
Magnesium chloride	205.605(b)	Used in tofu and fortification
Magnesium stearate*	205.605(b)	Used in fortification
Nutrient Minerals	205.605(b)	Used in fortification
Nutrient Vitamins	205.605(b)	Used in fortification.
Pectin(low-methoxy)	205.605(b)	Used in gelled desert applications.
Phosphoric Acid	205.605(b)	Used as acidulant for process pH control.

Potassium carbonate	205.605(b)	Used in baking applications
Potassium citrate	205.605(b)	Used as a buffering agent
Potassium hydroxide	205.605(b)	Used as neutralizing agent in ISP process
Potassium phosphate*	205.605(b)	Used in meat products.
Silicon dioxide	205.605(b)	Used as a flow aid
Sodium citrate	205.605(b)	Common buffering agent
Sodium hydroxide	205.605(b)	Common neutralizing agent
Sodium phosphates	205.605(b)	Used in meat applications
Sulfur dioxide*	205.605(b)	Used as process aid for microbiological control
Tocopherols	205.605(b)	Used for oxidation stabilization, such as in spray on oils & lecithin
Xanthan gum	205.605(b)	Stabilizer used in acidic applications such as salad dressings

Thank you for your time and consideration.

Sincerely,



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